

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO,
a/k/a CHILLE DeCASTRO,
a/k/a DELETE LAWZ,

Plaintiff,

v.

JOSHUA ABRAMS a/k/a
ACCOUNTABILITY FOR ALL, KATE
PETER a/k/a MASSHOLE
TROLL MAFIA,

Defendants.

CASE NO. 1:22-cv-11421-ADB

**DEFENDANT KATE PETER'S MOTION FOR LEAVE TO SUPPLEMENT THE
FACTUAL RECORD REGARDING PLAINTIFF JOSE MARIA DECASTRO'S
VIOLATIONS OF THE COURT'S OCTOBER 21, 2022 ORDER**

*"I just, I won't ever I won't ever ever stop until this chick is done. **Period.**
I don't care how long it takes."*

*"She's going to need that money . . . we don't stop over here! We don't stop! **We don't stop
under any circumstances under any conditions.**"*

*"The line of moral and immoral. Is that the line you're talking about? Because **you've crossed
way over into immoral when instead of taking care of your children, you lost those children to
adoption** instead of, and you worked on your trolling career."*

- Jose Maria DeCastro, October 21, 2022, on YouTube

Defendant Kate Peter ("Ms. Peter") hereby requests leave to supplement the factual record in order to seek a finding that Plaintiff Jose Maria DeCastro, a/k/a Chille DeCastro, a/k/a Delete Lawz ("Mr. DeCastro") has violated the October 21, 2022 order that the parties to this matter refrain from "any threatening, harassing, illegal, or otherwise inappropriate behavior when engaging with each other, or with any individual or entity that may have knowledge

pertaining to this matter.” See ECF No. 33. Despite the Court’s order, since the entry of that order on 4:31 PM EST on October 21, 2022, Mr. DeCastro has (i) threatened to weaponize this litigation to drain Ms. Peter of any available funds to force a settlement that is favorable to him; (ii) invoked the adoption of two of Ms. Peter’s children to say Ms. Peter is “immoral” and “bad” and trigger Ms. Peter’s post-traumatic stress disorder arising from a years-long extremely abusive relationship; (iii) apparently caused individuals who support Mr. DeCastro to repeatedly accost a witness at his home at night to seek to intimidate him into supporting Mr. DeCastro, following Mr. DeCastro’s apparent attempts to blackmail that witness; and (iv) radically mischaracterized this Court’s actions to his 48,000 subscribers on YouTube, including lying that the Court has dismissed Ms. Peter’s pending motion to dismiss the complaint.

As the affidavits submitted in support of this Motion demonstrate, Mr. DeCastro has violated the Court’s October 21, 2022 order in myriad respects. The relief which Ms. Peter seeks in her Emergency Motion to Dismiss or, in the Alternative, for Equitable Relief, is more warranted than ever. See ECF Nos. 27–29. Even beyond using litigation as a cudgel to seek to deprive Ms. Peter of every penny she has, seeking to “doxx” undersigned counsel, and otherwise harassing Ms. Peter and others, Mr. DeCastro has demonstrated his utter disregard for this Court’s orders. In further support thereof, Ms. Peter respectfully refers the Court to the affidavits of Kate Peter, Todd Lyon, and Benjamin Wish.

WHEREFORE, Ms. Peter respectfully requests that the Court (i) grant leave to supplement the record regarding her pending motion to dismiss with the affidavits filed herewith; (ii) find that Mr. DeCastro has violated the Court’s October 21, 2022 order (ECF No. 33); and (iii) grant the relief Ms. Peter seeks through her motion to dismiss (ECF No. 27).

LOCAL RULE 7.1(a)(2) CERTIFICATION

Undersigned counsel certifies that counsel for Defendants conferred with Plaintiff counsel in good faith to narrow or resolve the issues raised through this motion but could not avoid motion practice.

Respectfully submitted,

KATE PETER,

By her attorney,



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CERTIFICATE OF SERVICE

I, Benjamin J. Wish hereby certify that on October 24, 2022, I caused the foregoing document to be served via email upon the following *pro se* litigant and have further served him a copy via hand-delivery:

Jose Maria DeCastro (*Pro Se*)
1258 Franklin Street
Santa Monica, CA 90404
iamalaskan@gmail.com

/s/ Benjamin J. Wish

Benjamin J. Wish